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March 18, 2024

The Honorable Jennifer H. Rearden
United States District Judge
United States District Court
500 Pearl Street
Southern District of New York
New York, New York 10007

Re: United States v. Sergey Shestakov, 23 Cr. 16 (JHR)

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced matter and write to respectfully request (i) an adjournment of the June 12, 2024 trial date and (ii) a conference to discuss scheduling. I have discussed this trial adjournment request with the government, and the government has no objection to an adjournment of the trial date to a date in or before August 2024, but would object to a longer adjournment. Given that an adjournment will involve the schedule of the Court and the lawyers, I respectfully request a conference to address this issue.

The primary reason for this adjournment request is that an unforeseen scheduling conflict in another matter suddenly arose such that I cannot adequately prepare for the June 12 trial in this case and simultaneously prepare another client for testimony before Congress on May 24, 2024. Specifically, I represent former Governor Andrew M. Cuomo (“Governor Cuomo”) in matters related to the pandemic and ongoing civil litigation, and have been communicating with congressional staff to schedule his appearance before the U.S. House Committee on Oversight and Accountability and the Select Subcommittee on the Coronavirus Pandemic (the “Select Subcommittee”). On March 5, 2024, the Select Subcommittee issued a subpoena to Governor Cuomo requiring him to appear for a full day of testimony on Friday, May 24, 2024, that will require weeks of preparation. His failure to appear on that date would subject him to contempt proceedings. Despite weeks of communicating with Select Subcommittee staff in which I (a) specifically made them aware of my scheduling conflicts and particularly this case’s June 12 trial that I need to prepare for, and (b) provided several dates that both Governor Cuomo and I could be available for his testimony *after* the June 12 trial, the Select Subcommittee refused to accommodate my schedule. As counsel to Governor Cuomo in matters related to the pandemic, I will represent him for that testimony.

Moreover, we seek additional time to prepare for trial due to: (a) our review of the discovery materials that require translation from Russian to English is taking more time than we anticipated and the government provided limited translations of the discovery materials; (b) our need to seek records from foreign countries; and (c) our ongoing review of the voluminous

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discovery materials, particularly the materials produced in connection with the D.C. indictment of co-defendant Charles McGonigal.

Accordingly, we respectfully request an adjournment of the trial date and a conference with the Court to discuss scheduling.

Respectfully submitted,

/s/ Rita M. Glavin
Rita M. Glavin

Counsel for Defendant Sergey Shestakov